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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

MIR S. ELAHI AND SAWMIYEH M. ELAHI,

Plaintiffs,

v.

KEYBANK NA, EQUIFAX INFORMATION
SERVICES LLC, EXPERIAN
INFORMATION SOLUTIONS, INC.,
INNOVIS DATA SOLUTIONS, INC., AND
TRANS UNION LLC,

Defendants.

Case No. 2:20-cv-00174-KJD-VCF

**JOINT STIPULATION AND ORDER
EXTENDING DISCOVERY
DEADLINES**

(FIRST REQUEST)

Plaintiffs and Defendants hereby jointly move to extend all deadlines set forth in the Discovery Plan and Scheduling Order filed with this Court on May 6, 2020, (DKT.25) by a period of sixty (60) days.

1. On January 24, 2020, Plaintiffs filed their Complaint (Dkt. 1), against Defendants KeyBank NA, Equifax Information Services LLC ("Equifax"), Experian Information Solutions, Inc. ("Experian"), Innovis Data Solutions, Inc., and Trans Union, LLC ("Trans Union").

2. On February 26, 2020, Plaintiffs filed a Notice of Settlement with KeyBank NA (Dkt. 7). On February 27, 2020, Plaintiffs filed a Notice of Settlement with Innovis Data

Solutions, Inc. (Dkt. 8). On May 6, 2020, Plaintiff filed a Notice of Settlement with Experian (Dkt. 23).

3. Defendant Equifax filed its First Request Stipulation for Extension of Time to Respond to Plaintiffs' Complaint on March 27, 2020 (Dkt. 13) and its Second Request Stipulation for Extension of Time to Respond to Plaintiffs' Complaint on April 27, 2020 (Dkt. 21). Defendant Trans Union filed its Answer to Plaintiffs' Complaint on March 27, 2020 (Dkt. 16). Defendant Equifax filed its Answer to Plaintiffs' Complaint on May 27, 2020 (Dkt. 27).

4. The Plaintiffs and Defendants require more time, and accompanying deadlines from the Court, to adequately conduct discovery. The parties are discussing dates for Plaintiffs' depositions and possible resolution of this case. Counsel for Trans Union has a positive COVID-19 case in her home and is unable to travel or complete depositions in person until cleared by a medical professional.

5. The parties require more time, and accompanying deadlines from the Court, to adequately conduct discovery.

6. No party will be prejudiced by this Court granting this Stipulation as all parties jointly seek an extension of these deadlines. Moreover, the parties believe that allowing the extension will serve the ends of judicial economy.

7. Moreover, the requested extensions are not sought for the purposes of delay.

8. It is hereby requested that the Court extend discovery in the present matter as follows:

a. Discovery Plan:

Discovery Cut-off	11/23/2020
Deadline to Disclose Initial Expert Disclosures	09/22/2020
Deadline to Disclose Rebuttal Expert Disclosures	10/23/2020
Deadline to File Dispositive Motions	12/22/2020

b. Interim Status Report: The parties shall file the interim status report required by LR26-3 no later than **09/22/2020** or sixty (60) days prior to the close of discovery.

c. Pre-Trial Order: The parties shall file a joint pretrial order no later than 01/22/21 or thirty (30) days after the date set for filing dispositive motions. In the event that parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motion or further order of the Court

WHEREFORE, Plaintiffs and Defendants respectfully requests this Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling Order to reflect the requested extension.

DATED: July 15, 2020

**QUILLING, SELANDER, LOWNDS,
WINSLETT & MOSER, P.C.**

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ORDER EXTENDING DISCOVERY DEADLINES (FIRST REQUEST)

IT IS SO ORDERED.

Dated this 16th day of July 2020.



UNITED STATES MAGISTRATE JUDGE